

Exhibit B

Hellreich, Jaclyn

From: Cole, Dash
Sent: Tuesday, June 16, 2020 10:17 AM
To: Ray, Brent; Kurlancheek, Dara; Ramsey, Lida
Cc: Auth, Dorothy; Wizenfeld, Howard; Augelli, John; Russo, Michael
Subject: TriOptima v. Quantile - Claim Narrowing M&C Summary

Brent,

Thank you for meeting and conferring with us yesterday regarding narrowing the number of asserted claims in the case. As we noted, the large number of asserted claims will be a significant burden on the parties during the claim construction process and beyond, and courts routinely require patentees to limit the number of asserted claims during this phase of the case. Entering into the Model Order now will allow the parties to have an understanding regarding the dates and procedures by which the number of asserted claims will be reduced. You indicated that you will review the Model Order and get back to us later this week regarding whether TriOptima would agree to the Model Order or will refuse to negotiate the Model Order. We look forward to hearing your position.

Thanks,
Dash

Dash Cole

Associate

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